

FRP CHECKLIST



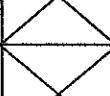

CHECKLIST FOR VERIFYING COMPLIANCE WITH FACILITY RESPONSE PLAN REQUIREMENTS

Facility Name BP Toledo Refinery
FRP0500214

REVIEW ITEMS	ADEQUATELY ADDRESSED		
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	PLAN		
	YES	NO	N/A
Response Plan Cover Sheet (sec. 2.0)	X		
<ul style="list-style-type: none"> General Information (sec. 2.1) Applicability of Substantial Harm Criteria (sec. 2.2) Certification (sec. 2.3) 	X		
	X		
	X		
Please use the following space to note any missing or incomplete information on the cover sheet and to assess the accuracy of the substantial harm determination based on field inspection.			
Emergency Response Action Plan (ERAP) (sec. 1.1)	YES	NO	N/A
<ul style="list-style-type: none"> Qualified Individual (QI) Information (sec. 1.2) Emergency Notification List (sec. 1.3.1) Spill Response Notification Form (sec. 1.3.1) Response Equipment List and Location (sec. 1.3.2) Response Equipment Testing and Deployment (sec. 1.3.4) Facility Response Team List (sec. 1.3.4) Evacuation Plan (sec. 1.3.5) Immediate Actions (sec. 1.7.1) 	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		

REVIEW ITEMS	ADEQUATELY ADDRESSED		
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	PLAN		
	YES	NO	N/A
Please use the following space to note any missing or incomplete information in Section 1.2 of the plan and, to the extent possible, assess the accuracy of the information provided based on field inspection.			
Emergency Response Information (sec. 1.3)	YES	NO	N/A
Notification (sec. 1.3.1)	X		
• Emergency Notification Phone List	X		
- National Response Center phone number	X		
- QI (day and evening) phone numbers	X		
- Company response team (day and evening) phone numbers	X		
- Federal On-Scene Coordinator (OSC) and/or Regional response center (day and evening) phone numbers		X	
- Local response team phone numbers (Fire Department/Cooperatives)	X		
- Fire marshal (day and evening) phone numbers	X		
- State emergency Response Phone number(s)	X		
- State Police phone number		X	
- SERC and LEPC phone number	X		
- Wastewater treatment facility(s) name and phone number (recommended)		X	
- Local water supply system (day and evening) phone numbers	X		
- Weather report phone number	X		
- Local TV/radio phone number(s) for evacuation notification	X		
- Spill Response contractor(s)		X	

REVIEW ITEMS		ADEQUATELY ADDRESSED		
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	PLAN			
	YES	NO	N/A	
<p>Please use the following space to note any missing or incomplete information in Section 1.3.2 of the plan and to assess the accuracy of the information provided and adequacy of equipment arrangements based on field inspection of on-site equipment and a review of contractual or other arrangements. (Note: A U.S. Coast Guard classified Oil Spill Removal Organization (OSRO) may be listed in the plan instead of an equipment list, 5</p> <p>List other response equipment</p>				
Response Equipment Testing and Deployment Drill Log (sec. 1.3.3)		YES	NO	N/A
• Date of Last Inspection or Equipment Test		X		
• Inspection Frequency		X		
• Date of Last Deployment		X		
• Deployment Frequency		X		
• OSRO Certification			X	
<p>Please use the following space to note any missing or incomplete information in Section 1.3.3 of the plan and verify that the log information is up-to-date during the field inspection.</p>				
Personnel (sec. 1.3.4)		YES	NO	N/A
• Emergency Response Personnel Information		X		
- Name		X		
- Phone numbers (work/home, other)		X		
- Response time		X		

REVIEW ITEMS	ADEQUATELY ADDRESSED		
<p>Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.</p> <ul style="list-style-type: none"> - Prevailing wind directions and speed - Water currents, tides, or wave conditions (if applicable) - Arrival route of emergency response personnel and response equipment - Evacuation routes - Alternative routes of evacuation - Transportation of injured personnel to nearest emergency medical facility - Location of alarm/notification systems - Centralized check-in area for roll call - Mitigation command center location - Location of shelter at facility 	PLAN		
	YES	NO	N/A
	X		
		X	
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	<p>• Community Evacuation Plans referenced (sec. 1.3.5.3)</p>		
<p>Please use the following space to note any missing or incomplete information in Section 1.3.5 of the plan and to assess the accuracy of the information provided based on field inspection.</p>			
<p>Description of Qualified Individual's Duties (sec. 1.3.6)</p> <ul style="list-style-type: none"> • Activate internal alarms and hazard communication systems • Notify response personnel • Identify character, exact source, amount, and extent of the release • Notify and provide information to appropriate Federal, State and local authorities 	YES	NO	N/A
	X		
	X		
	X		
	X		

REVIEW ITEMS	ADEQUATELY ADDRESSED		
<p>Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.</p> <ul style="list-style-type: none"> - Surface Area(s)/Year(s) of construction - Maximum Capacity(s) - Failure(s)/Cause(s) • Labeled schematic drawing • Description of transfers (loading and unloading) and volume of material • Description of daily operations • Secondary containment volume(s) • Normal daily throughput of the facility 	PLAN		
	YES	NO	N/A
	X		
	X		
		X	
	X		
	X		
	X		
	X		
	X		
<p>Please use the following space to note any missing or incomplete information in Section 1.4.1 of the plan and to assess the accuracy of the information based on field inspection.</p>			
<p>Vulnerability Analysis (sec. 1.4.2) (See Appendix A - Calculation of the Planning Distance)</p> <ul style="list-style-type: none"> • Analysis of potential effects of an oil spill on vulnerable areas. <ul style="list-style-type: none"> - Water intakes - Schools - Medical facilities - Residential areas - Businesses - Wetlands or other sensitive environments 	YES	NO	N/A
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		

REVIEW ITEMS	ADEQUATELY ADDRESSED		
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	PLAN		
	YES	NO	N/A
<p>Please use the following space to note any missing or incomplete information in Section 1.4.3 of the plan and to assess the accuracy of the information provided based on field inspection.</p>			
Facility Reportable Oil Spill History Description (sec. 1.4.4) <ul style="list-style-type: none"> • Date of discharge(s) • List of discharge causes • Material(s) discharged • Amount of discharges in gallons • Amount that reached navigable waters (if applicable) • Effectiveness and capacity of secondary containment • Clean-up actions taken • Steps taken to reduce possibility of reoccurrence • Total oil storage capacity of tank(s) or impoundment(s) from which material discharged • Enforcement actions • Effectiveness of monitoring equipment • Spill detection 	YES	NO	N/A
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		
	X		

REVIEW ITEMS		ADEQUATELY ADDRESSED		
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		PLAN		
		YES	NO	N/A
Please use the following space to note any missing or incomplete information in Section 1.5.1 of the plan and to assess the accuracy of the information provided based on field inspection.				
Worst Case Discharge (sec. 1.5.2) (See Appendix A)		YES	NO	N/A
<ul style="list-style-type: none"> • Correct Worst Case Discharge (WCD) calculation for specific type of facility 		X		
<ul style="list-style-type: none"> • Correct WCD calculation for "complexes" 		X		
<ul style="list-style-type: none"> • Sufficient response resources for WCD 		X		
<ul style="list-style-type: none"> • Sources and quantity of equipment for response to WCD 		X		
<ul style="list-style-type: none"> • Oil storage capacity for recovered material 		X		
Please use the following space to note any missing or incomplete information in Section 1.5.2 of the plan and to assess the accuracy of the information provided during field inspection.				
Discharge Detection Systems (sec. 1.6)		YES	NO	N/A
Discharge Detection by Personnel (sec. 1.6.1)			X	
<ul style="list-style-type: none"> • Description of procedures and personnel for spill detection 			X	
<ul style="list-style-type: none"> • Description of facility inspections 			X	
<ul style="list-style-type: none"> • Description of initial response actions 			X	
<ul style="list-style-type: none"> • Emergency Response Information (referenced) 			X	

REVIEW ITEMS	ADEQUATELY ADDRESSED		
<p>Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.</p> <p>Please use the following space to note any missing or incomplete information in Section 1.7 of the plan.</p>	PLAN		
	YES	NO	N/A
<p>Disposal Plan (sec. 1.7.2)</p> <ul style="list-style-type: none"> Description of procedures for recovering, reusing, decontaminating or disposing of materials Materials addressed in Disposal Plan (Recovered product, contaminated soil, contaminated equipment and materials, personnel protective equipment, decontamination solutions, adsorbents, spent chemicals) Plan prepared in accordance with any Federal, State, and/or local regulations Plan addresses permits required to transport or dispose of recovered materials 	YES	NO	N/A
	X		
	X		
	X		
	X		
<p>Please use the following space to note any missing or incomplete information in Section 1.7.2 of the plan.</p>			
<p>Containment and Drainage Planning (sec. 1.7.3) (<i>See Section II, 112.7(e)(1), 112.7(e)(7) and Appendix A</i>)</p> <ul style="list-style-type: none"> Description of containing/controlling a spill through drainage. <ul style="list-style-type: none"> Containment volume Drainage route from oil storage and transfer areas Construction materials in drainage troughs 	YES	NO	N/A
	X		
		X	
	X		
		X	

REVIEW ITEMS	ADEQUATELY ADDRESSED		
<p>Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.</p> <ul style="list-style-type: none"> - Inspection date - Inspector's signature 	PLAN		
	YES	NO	N/A
	X		<input checked="" type="checkbox"/>
	X		<input checked="" type="checkbox"/>
<p>Please use the following space to note any missing or incomplete information in Section 1.8 of the plan and to assess the accuracy of the information provided based on field inspection.</p>			
<p>Facility Drills/Exercises (sec. 1.8.2)</p> <ul style="list-style-type: none"> • Description of drill/exercise program based on PREP guidelines or other comparable program <ul style="list-style-type: none"> - QI notification drill - Spill management team tabletop exercise - Equipment deployment exercise - Unannounced exercise - Area exercise • Description of evaluation procedures for drill program 	YES	NO	N/A
		X	<input checked="" type="checkbox"/>
	X		<input checked="" type="checkbox"/>
	X		<input checked="" type="checkbox"/>
	X		<input checked="" type="checkbox"/>
	X		<input checked="" type="checkbox"/>
	X		<input checked="" type="checkbox"/>
	X		<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • Qualified Individual Notification Drill Log (sec. 1.8.2.1) (Date, company, qualified individual, other contacted, emergency scenario, evaluation) 	X		<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • Spill Management Team Tabletop Drill Log (sec. 1.8.2.2) (Date, company, qualified individual, participants, emergency scenario, evaluation, changes to be implemented, time table for implementation) 	X		<input checked="" type="checkbox"/>
<p>Please use the following space to note any missing or incomplete information in Section 1.8.2 of the plan and to assess the accuracy of the information provided based on field inspection.</p>			

REVIEW ITEMS		ADEQUATELY ADDRESSED		
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.		PLAN		
		YES	NO	N/A
Please use the following space to note any missing or incomplete information in the Site Plan diagram and to assess the accuracy of the diagram based on field inspection.				
Site Drainage Plan Diagram		YES	NO	N/A
• Major sanitary and storm sewers, manholes, and drains		X		
• Weirs and shut-off valves		X		
• Surface water receiving streams		X		
• Fire fighting water sources		X		
• Other utilities		X		
• Response personnel ingress and egress		X		
• Response equipment transportation routes		X		
• Direction of spill flow from discharge points		X		
Please use the following space to note any missing or incomplete information in the Site Drainage Plan diagram and to assess the accuracy of the diagram based on field inspection.				
Site Evacuation Plan Diagram		YES	NO	N/A
• Evacuation routes		X		
• Location of regrouping areas		X		

A. FACILITY SUMMARY

1.0 GENERAL INFORMATION

Facility Name: BP Oil Company - Toledo Refinery FRP Number: FRP0500214

Facility Address: 4001 Cedar Point Road Telephone: (419) 698-6200
Oregon, OH 43616

Facility Owner: BP Oil Company

Owner Address: Not Provided Telephone: Not Provided

Name of Protected Waterways/Environmentally Sensitive Areas: Otter Creek,
Maumee River, Lake Erie

Distance from Facility: Adjacent

2.0 FACILITY OVERVIEW

The facility is an oil refinery with a capacity to process 131,000 barrels of crude oil per day plus 10,000 barrels of gas oil for catalytic cracking feed and 5,000 barrels per day of butane for the alkylation unit. The refinery has a total storage capacity of approximately 5.43 million barrels (228,066,000 gallons). The facility is located at the mouth of the Maumee River adjacent to Maumee Bay (Lake Erie). The site is bounded by Otter Creek Road on the west; Bay Shore Road on the north; Dupont Road on the east; and Cedar Point Road on the south. The date oil storage began is not provided.

3.0 FRP APPLICABILITY

The facility conducts over-water transfers of oil to or from vessels; the facility lacks adequate secondary containment for each aboveground storage tank; the facility has had a spill of greater than 10,000 gallons in the last 5 years; the facility is located at a distance that would shut down a public drinking water intake; the facility is located at a distance that could cause injury to an environmentally sensitive area; and the total storage capacity is greater than one million gallons.

C. FRP REVIEW CHECKLIST

The following checklist items correspond to the proposed regulations as outlined in 40 CFR Part 112.20, Appendix G. For all checklist items, indicate the FRP adequacy as follows: adequately addressed (+), inadequately addressed (-), not addressed (0), or is not applicable (NA).

	<u>Remarks</u>
1.0 <u>STANDARD FACILITY RESPONSE PLAN</u>	
1.1 <u>EMERGENCY RESPONSE ACTION PLAN</u>	
+ Separate section of FRP	<u>Section 3.0.</u>
+ Emergency response coordinator information	_____
- Emergency notification phone list	_____
- Spill response notification form	_____
0 Equipment list	_____
0 Facility response team list	_____
0 Facility evacuation plan	_____
+ Immediate actions	_____
0 Facility diagrams	_____
1.2 <u>FACILITY INFORMATION</u>	
+ Facility name and location	<u>(Section 1.5).</u>
0 Latitude and longitude	_____
0 Wellhead protection area	_____
+ Owner/operator	<u>(Section 1.5).</u>
- Emergency response coordinator	<u>The address and training of the coordinator are not provided (Section 1.5).</u>
0 Date of oil storage start-up	_____
0 Current operation	_____
0 Date and type of substantial expansion	_____
1.3 <u>EMERGENCY RESPONSE NOTIFICATION</u>	
1.3.1 <u>Notification</u>	
Phone List:	
+ National Response Center	<u>(Section 3, page 3-11).</u>
+ Facility Response Coordinator	<u>(Section 3, page 3-10).</u>

1.3.4 Evacuation Plans

- ☐ Facility-wide evacuation plan
- ☐ Evacuates high risk exposure areas (surrounding communities)
- ☐ Routes shown on a diagram

The FRP does not include a discussion of evacuation plans.

1.3.5 Coordinator's Duties

- ☐ Description of duties
- ☐ Consistent with requirements

(Section 2).

The coordinators duties are distributed among numerous positions within the incident command system (Section 2).

1.4 HAZARD EVALUATION

1.4.1 Hazard Identification

- ☐ Labeled schematic drawing
- ☐ Aboveground tanks identified separately
- ☐ Below ground tanks identified separately
- ☐ Surface impoundments identified separately

(Appendix A, Figure A-1).

(Appendix A, Figure A-1).

Tank Form:

- ☐ Tank number
- ☐ Substance stored
- ☐ Quantity stored
- ☐ Tank type and year installed
- ☐ Maximum capacity
- ☐ Failure/cause

(Appendix A, Table A-1).

(Appendix A, Table A-1).

(Appendix A, Table A-1).

(Appendix A, Table A-1).

Surface Impoundment Form:

- ☐ Surface Impoundment number
- ☐ Substance stored
- ☐ Quantity stored
- ☐ Surface area/year
- ☐ Maximum capacity
- ☐ Failure/cause

The FRP does not include a surface impoundment form.

Facility Operations Description:

- ☐ Loading and unloading procedures
- ☐ Day to day operations
- ☐ Secondary containment
- ☐ Daily throughput

(Appendix A, page A-1).

0	Steps taken to reduce possibility of recurrence	
0	Total storage capacity of the tank(s) or impoundment(s) from which material is discharged	
0	Enforcement actions	
0	Effectiveness of monitoring equipment	
0	Description of how each spill was detected	

1.5 DISCHARGE SCENARIOS

1.5.1 Small and Medium Volume Discharges

Small Volume Discharge:

0	Small volume discharge calculation for a facility	
0	Facility-specific spill potential analysis	
+	Average most probable discharge for "complexes"	(Section 3.2.3, Table 3.2-1).
+	1,000 feet of boom and means for immediate deployment	(Appendix C, Table C-1).
+	Oil recovery devices equal to small discharge (2 hour recovery time)	(Appendix C, Table C-1).
+	Oil storage capacity for recovered material	(Appendix C, Table C-1).

Medium Volume Discharge:

0	Medium volume discharge calculation for a facility	
0	Facility-specific spill potential analysis	
+	Maximum most probable discharge for "complexes"	(Section 3.2.3, Table 3.2-1).
+	Availability of sufficient quantity of boom	(Appendix C, Table C-1).
+	Oil storage capacity for recovered material	(Appendix C, Table C-1).

1.5.2 Worst Case Discharge (WCD)

-	Correct WCD calculations	The facility calculated its WCD by oil group. The correct WCD volume is 335,730 barrels (14,100,660 gallons).
0	Correct WCD for "complexes"	
+	Sufficient response resources for WCD	(Appendix C).
+	Sources and quantity of equipment for response to WCD	(Appendix C).
+	Oil storage capacity for recovered material	(Appendix C).

1.6 DISCHARGE DETECTION SYSTEMS

1.6.1 Discharge Detection by Personnel

0	Detection procedures	The FRP did not include a discussion of discharge detection systems.
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1.8.1.2 Response Equipment Inspection

Response Equipment checked for:

- ☐ Inventory (item and quantity) _____
- ☐ Storage location (time to access and respond) _____
- ☐ Operation status/condition _____
- ☐ Actual use/testing (last test date and frequency of testing) _____
- ☐ Shelf life _____

1.8.1.3 Secondary Containment Inspection

- ☐ Dike or berm system _____
- ☐ Secondary containment _____
- ☐ Retention and drainage ponds _____

1.8.2 Mock Alert Drills

- ☐ Mock alert drill description _____ (Section 6.3.3, pages 6-14 to 6-17).
- ☐ Mock Alert Drill Logs _____

1.8.3 Training and Meeting Logs

- ☐ Lists formal response training for each employee _____ The training program is described; however, no list of employees and their training is included (Section 6).
- ☐ Personnel Training Logs _____
- ☐ Discharge Prevention Meeting Log _____

1.9 DIAGRAMS

Site diagram includes:

- ☐ Entire facility to scale _____ (Appendix A, Figure A-1).
- ☐ Above and below ground bulk storage tanks _____ (Appendix A, Figures A-1 and A-2).
- ☐ Contents and capacities of bulk storage tanks _____
- ☐ Contents and capacities of drum storage areas _____
- ☐ Process buildings _____
- ☐ Transfer areas _____
- ☐ Secondary containment systems _____ (Appendix A, Figure A-1).
- ☐ Structures where hazardous materials are used and capacity _____
- ☐ Location of communication and emergency response equipment _____ (Appendix A, Figure A-1).
- ☐ Location of electrical equipment which contains oil _____

Page three:

 + Determination of substantial harm

The facility conducts over-water transfers of oil to or from
vessels; the facility is located at a distance that would shut
down a drinking water intake; the facility is located at a
distance that could cause injury to an environmentally
sensitive area; the facility lacks adequate secondary
containment for each aboveground storage tank area
sufficiently large to contain the volume of the largest
aboveground storage tank; the facility has experienced a spill
of greater than 10,000 gallons within the last 5 years and the
total storage capacity is greater than one million gallons.

 + Latitude and longitude

41°40'45"N 83°26'45"W

 + Facility distance to navigable waters

0 - 0.25 mile

 + Certification

J. T. Jacobson, Plant Manager

ATTACHMENT 1

ON-WATER RECOVERY CAPACITY

On-Water Oil Recovery:

Tier 1 (On-Water Recovery * Emulsification Factor * Mobilization Factor for Tier 1) =	<u>50,360</u>
Tier 2 (On-Water Recovery * Emulsification Factor * Mobilization Factor for Tier 2) =	<u>83,933</u>
Tier 3 (On-Water Recovery * Emulsification Factor * Mobilization Factor for Tier 3) =	<u>134,292</u>

SHORELINE CLEANUP VOLUME

On-Shore Recovery * Emulsification Factor =	<u>335,730</u>
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AMOUNT NEEDED TO BE CONTRACTED FOR

Tier 1 (bbls/day) (From Table 5 by Geographic Area) =	<u>10,000</u>
Tier 2 (bbls/day) (From Table 5 by Geographic Area) =	<u>20,000</u>
Tier 3 (bbls/day) (From Table 5 by Geographic Area) =	<u>40,000</u>

AMOUNT NEEDED TO BE IDENTIFIED, BUT NOT CONTRACTED FOR IN ADVANCE

Tier 1 (bbls/day) (On-Water Recovery - Contracted Amount) =	<u>40,360</u>
Tier 2 (bbls/day) (On-Water Recovery - Contracted Amount) =	<u>63,933</u>
Tier 3 (bbls/day) (On-Water Recovery - Contracted Amount) =	<u>94,292</u>

sent to Karen Vendo
via: 170 11-15-94

FRP CHECKLIST: FINAL RULE ADDENDUM

Facility Name: BP Oil Company - Toledo Refinery

FRP Number: FRP 0500214

Reviewed By: Joseph Fredle

Date of Review: _____

Each heading number designates the location of the regulatory requirement in 40 CFR 112, Appendix F, Final Rule. For all checklist items, indicate the FRP adequacy as follows: adequately addressed (+), inadequately addressed (-), not addressed (0), or is not applicable (NA).

Remarks

SECTION 1.3 EMERGENCY RESPONSE NOTIFICATION

Section 1.3.4 Evacuation Plans

0 Facility owner/operator reference of existing community evacuation plans _____

SECTION 1.7 PLAN IMPLEMENTATION

Section 1.7.1 Response Resources

- Immediate Actions Form for small, medium, and worst-case spills Actions need to be expanded upon and more site specific.

SECTION 1.8 SELF-INSPECTION, DRILLS/EXERCISES, AND RESPONSE TRAINING

Section 1.8.2 Drills/Exercises

+ Drill/exercise program description _____

+ Qualified Individual Notification Drills _____

+ Spill Management Team Tabletop Exercises _____

+ Equipment deployment exercises _____

+ Unannounced exercises _____

+ Area Exercises _____

0 Qualified Individual Notification Drill Log _____

0 Spill Management Team Tabletop Drill Log _____

SECTION 1.9 DIAGRAMS

Facility Diagram

0 Federal jurisdictional boundaries of the facility _____